

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

INSIGHT GLOBAL, LLC,

Plaintiff,

vs.

**DANIEL WENZEL, LUKE NORMAN,
LAUREN SUTMAR, and
BEACON HILL STAFFING GROUP, LLC,**

Defendants.

CASE NO. 1:17-CV-8323-PGG

DEFENDANTS' PROPOSED EXHIBIT LIST

Defendant Exhibit No.	Description	ATTACHED OR FILED UNDER SEAL
Def. 1	May 8, 2013 offer letter from Insight Global to Daniel Wenzel	Attached
Def. 2	May 9, 2013 email from Sean Law to Daniel Wenzel (starting at IG_00000937)	Attached
Def. 3	May 16, 2013 email from Sean Law to Daniel Wenzel (starting at IG_00000991)	Attached
Def. 4	May 16, 2013 emails between Daniel Wenzel and Cassandra Kanas and Andrea Bombino at Insight Global (starting at IG_00000993 and IG_0000000995)	Attached

Def. 5	May 16, 2013 email from Sean Law to Daniel Wenzel with attachments (starting at IG_00000939)	Attached
Def. 6	May 20, 2013 emails between Sean Law and Daniel Wenzel (starting at IG_0000000997)	Attached
Def. 7	May 22, 2013 email from Sean Law to Daniel Wenzel (IG_000000959)	Attached
Def. 8	May 22, 2013 email from Daniel Wenzel to Sean Law, with attachments (starting at IG_00000948)	Attached
Def. 9	June 10, 2013 email from Daniel Wenzel to Rachel Peacock, with attachments (starting at IG_000000960)	Attached
Def. 10	June 10, 2013 email from Daniel Wenzel to Sean Law with attachments (starting at IG_000000966)	Attached
Def. 11	June 12, 2013 email from Sean Law to Daniel Wenzel with attachments (starting at IG_00000972)	Attached
Def. 12	June 12, 2013 email from Sean Law to Daniel Wenzel (starting at IG_00000974)	Attached
Def. 13	June 2013 emails between Rachel Peacock and Daniel Wenzel (IG_0000001000 to 1002)	Attached
Def. 14	December 3, 2013 email from Lauren Sutmar to Luigi Prainito (starting at IG_00000001012)	Attached
Def. 15	January 9, 2014 email from Lauren Sutmar to Luigi Prainito (starting at IG_00000977)	Attached

Def. 16	January 28, 2014 email from Lauren Sutmar to Luigi Prainito, with attachments (starting at IG_0000000981)	Attached
Def. 17	January 28, 2014 email from Lauren Sutmar to Luigi Prainito, with attachments (starting at IG_000000986)	Attached
Def. 18	December 2, 2014 offer letter from Insight Global to Luke Norman (IG_00000174)	Attached
Def. 19	December 15, 2014 email from Luke Norman to Sean Law (starting at IG_00001027)	Attached
Def. 20	December 12, 2014 email from Sean Law at Insight Global to Luke Norman, with attachments (starting at IG_000000906)	Attached
Def. 21	Insight Global At-Will Employment Agreement, signed by Luke Norman on February 8, 2016	Attached
Def. 22	Insight Global At-Will Employment Agreement, signed by Daniel Wenzel on November 21, 2016	Attached
Def. 23	Insight Global At-Will Employment Agreement, signed by Lauren Sutmar on April 6, 2016	Attached
Def. 24	June 16, 2017 Email from Daniel Wenzel, forwarding November 2016 chain of emails between Daniel Wenzel and Sarah Bosco and enclosing "Arbitration and Internal Agreements" (IG_00000005 to IG_00000022)	Attached

Def. 25	Insight Global Screenshot showing “Demotion” of Daniel Wenzel and dated February 24, 2017 (IG_00000275)	Attached
Def. 26	February 2017 Text messages between Lauren Sutmar and Daniel Pride (LS_000055 to 58)	Attached
Def. 27	Offer Letter to Daniel Wenzel from Beacon Hill (DW 00001 to 2)	Attached
Def. 28	Offer Letter to Lauren Sutmar from Beacon Hill (LS 00001)	Attached
Def. 29	Offer Letter to Luke Norman from Beacon Hill (LN 00001 to 2)	Attached
Def. 30	April 24, 2015 Subcontracting Agreement between Agile.1 and Insight Global, for provisions of services to NBC Universal (IG_00000581 to IG_00000000637) and amendments (IG_00000577 to 580)	Filed Under Seal
Def. 31	Consulting Services Agreement between Insight Global and NBC Universal, dated May 9, 2012 (IG_00000000638 to IG_00000000658)	Filed Under Seal
Def. 32	Consulting Agreement between Insight Global and Sony Music Entertainment, dated August 26, 2013 (IG_0000000843 to IG_0000000853)	Filed Under Seal
Def. 33	Insight Global Master Services Agreement for Staffing Services, with Museum of Modern Art, dated March 1, 2015 (IG_00000856 to IG_00000000000867) and amendments (IG_00000854 to 855)	Filed Under Seal
Def. 34	September 5, 2013 Subcontracting Agreement between Agile.1 and Beacon Hill Staffing Group, for provisions of services to NBC Universal	Filed Under Seal
Def. 35	Master Temporary Professional Agreement between KPMG LLP and Beacon Hill Staffing Group, LLC, dated January 4, 2011 (BHSG0000261 to 293), and amendments	Filed Under Seal

Def. 36	Beacon Hill Temporary Service Agreement and Direct Hire and Conversion Fee Structure, with Revlon, signed August 8, 2013	Filed Under Seal
Def. 37	Temporary Services and Direct Hire Placement, Temporary Employment, agreement between Beacon Hill and Museum of Modern Art (BHSG0000880 to 882).	Filed Under Seal
Def. 38	Contingent Search Firm Agreement between NBC Universal Media, LLC and Beacon Hill, commencing on May 1, 2013 (BHSG0000422 to 429)	Filed Under Seal
Def. 39	Consulting Services Agreements between Charter Communications and Beacon Hill Staffing Group, dated July 2014, October 21, 2014, and amendments and addenda	Filed Under Seal
Def. 40	Disney ABC Television Group Agreement for Permanent Placement, dated November 12, 2015	Filed Under Seal
Def. 41	Background Screening Certification – Beacon Hill Staffing Group and Time Warner Cable, dated December 2016	Filed Under Seal
Def. 42	Agreements between Beacon Hill and Deloitte, dating back to 2008	Filed Under Seal
Def. 43	Managed Supplier Agreement between PeopleScout MSP, LLC and Beacon Hill Staffing Group, LLC, for temporary labor services for Hearst Enterprise Services, Inc., dated April 11, 2017	Filed Under Seal
Def. 44	Master Temporary Professional Agreement between KPMG LLP and Beacon Hill Staffing Group, dated January 4, 2011 (BHSG0000261 to 293)	Filed Under Seal
Def. 45	Agreements with KPMG, LLP, dated August 17, 2005 and October 6, 2006 (BHSG0000251 to 260)	Filed Under Seal
Def. 46	Participation Agreement with Hospira, a Pfizer company, dated January 2, 2017	Filed Under Seal
Def. 47	Agreements between NYU Langone and Beacon Hill Staffing Group, LLC	Filed Under Seal

Def. 48	Email between Daniel Wenzel and Bob Madalone, October 30, 2017 (BHSG0000147), and Daniel Wenzel and Malik Zegdi (BHSG0000144)	Filed Under Seal
Def. 49	Emails between Daniel Wenzel and Rajavi Shah @ Charter.com (BHSG0000142 and BHSG00000329)	Filed Under Seal
Def. 50	Email from Dave Cornine to Daniel Wenzel, January 8, 2018 (BHSG 0000566)	Filed Under Seal
Def. 51	DiscoverOrg and LinkedIn directories identifying employees and contact information at NBC Universal	Filed Under Seal
Def. 52	DiscoverOrg and LinkedIn directories identifying employees and contact information at Compass	Filed Under Seal
Def. 53	DiscoverOrg and LinkedIn directories identifying employees and contact information at Time Warner	Filed Under Seal
Def. 54	DiscoverOrg and LinkedIn directories identifying employees and contact information at The New York Times	Filed Under Seal
Def. 55	DiscoverOrg and LinkedIn directories identifying employees and contact information at Charter Communications	Filed Under Seal

Def. 56	DiscoverOrg and LinkedIn directories identifying employees and contact information at Sony Music Entertainment	Filed Under Seal
Def. 57	DiscoverOrg and LinkedIn directories identifying employees and contact information at KPMG	Filed Under Seal
Def. 58	DiscoverOrg and LinkedIn directories identifying employees and contact information at Revlon	Filed Under Seal
Def. 59	LinkedIn directories identifying employees and contact information at ABC Television.	Filed Under Seal
Def. 60	DiscoverOrg and LinkedIn directories identifying employees and contact information at Pfizer	Filed Under Seal
Def. 61	DiscoverOrg and LinkedIn directories identifying employees and contact information at Deloitte	Filed Under Seal
Def. 62	DiscoverOrg and LinkedIn directories identifying employees and contact information at Hearst	Filed Under Seal
Def. 63	DiscoverOrg and LinkedIn directories identifying employees and contact information at Penguin Random House	Filed Under Seal
Def. 64	DiscoverOrg and LinkedIn directories identifying employees and contact information at Spotify	Filed Under Seal
Def. 65	DiscoverOrg and LinkedIn directories identifying employees and contact information at Alliance Bernstein	Filed Under Seal
Def. 66	Professional Recruiter Training (IG_0000710 to IG_00000738)	Filed Under Seal

Def. 67	Excerpts from Insight Global training (IG_00000805 to IG_00000808)	Filed Under Seal
Def. 68	Insight Global text messages (IG_000001592) (IG_000001601) (IG_000001850-1851) (IG_00002002) (IG_0000002011) (IG_000002090)	Filed Under Seal
Def. 69	Exhibit 6 to Skylar Cuppy Deposition	Attached
Def. 70	Exhibit 12 to February 1, 2019 Bednar Declaration (https://blog.classesandcareers.com/advisor/what-you-wish-you-d-known-before-your-job-interview).	Attached
Def. 71	Spreadsheet Bates-stamped IG_00002144 – Hiring and Termination Data for the Insight Global New York City Office	Filed Under Seal
Def. 72	Insight Global’s Responses to Requests for Admission	Attached
Def. 73	April 11, 2016 Settlement Agreement	Filed Under Seal
Def. 74	AICPA Forensic & Valuation Services Practice Aid: Attaining Reasonable Certainty in Economic Damages Calculations, 2015 (cited in and produced with Klerowski expert report)	Attached
Def. 75	AICPA Code of Professional Conduct Effective December 15, 2014, updated through August 31, 2016 (cited in and produced with Klerowski expert report)	Attached
Def. 76	AICPA Litigation Services and Applicable Professional Standards, Consulting Services Special Report 03-1 (cited in and produced with Klerowski expert report)	Attached
Def. 77	AICPA Forensic and Valuation Services Practice Aid, Calculating Lost Profits (cited in and produced with Klerowski expert report)	Attached

Def. 78	AICPA Consulting Services Statement of Standards for Consulting Services CS Section 100 (2015) (cited in and produced with Klerowski expert report)	Attached
Def. 79	KForce Inc., Job Posting, KForce My Hiring website, available at https://myhiring.kforce.com/careersection/ex/jobdetail.ftl?job=180746&tz=GMT-04%3A00 (Last Accessed July 4, 2018) (cited in and produced with Klerowski expert report)	Attached
Def. 80	Resources Global Professionals, "Investor Relations", The Resources Global Professionals website, available at http://ir.rgp.com/investor-relations (Last Accessed July 4, 2018)	
Def. 81	Resources Global Professionals, Job Posting, RGP Careers Website, available at http://careers.rgp.com/ShowJob/Id/136803/Executive-Search-Recruiter-Accounting-Finance/ (Last Accessed July 4, 2018) (cited in and produced with Klerowski expert report)	Attached
Def. 82	Robert Half Inc, Job Posting, Robert Half Workday Jobs website, available at https://roberthalf.wd1.myworkdayjobs.com/en-US/RobertHalfStaffingCareers/job/NEW-YORKMIDTOWN/Midtown-RH-Technology-CS-Sr-Recruiter_JR-204004 (Last Accessed July 4, 2018) (cited in and produced with Klerowski expert report)	Attached
Def. 83	Rebuttal expert report of Jon P. Klerowski, dated July 6, 2018	Attached
Def. 84	Professional Biography of Jon P. Klerowski, updated as of March 2019	Attached

ECKERT SEAMANS CHERIN & MELLOTT, LLC

/s/ Charlotte L. Bednar

Geraldine A. Cheverko (gcheverko@eckertseamans.com)

Charlotte L. Bednar (cbednar@eckertseamans.com)

Anthony M. Moccia (amoccia @eckertseamans.com)

ECKERT SEAMANS CHERIN & MELLOTT, LLC

10 Bank St., Suite 700

White Plains, NY 10606

Phone: (914) 949-2909

Facsimile: (914) 949-5424

***Attorneys for Defendants Daniel Wenzel, Luke Norman,
Lauren Sutmar and Beacon Hill Staffing Group, LLC***

Dated: March 19, 2019

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon all counsel of via ECF on this 19th day of March 2019, upon the following counsel:

Edward Filusch
Jessica Rosenberg
Kasowitz Benson Torres LLP
1633 Broadway
New York, New York 10019
VIA EMAIL: efilusch@kasowitz.com
jrosenberg@kasowitz.com

Ariel D. Zion
Insight Global, LLC
4170 Ashford Dunwoody Road, NE
Suite 250
Atlanta, Georgia 30319
VIA EMAIL: Ariel.Zion@insightglobal.com

/s/ Charlotte L. Bednar